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REMARKS

The Examiner is thanked for the indication of allowable subject matter. The Examiner has objected to Claims 8, 10, 14 and 16 as being dependent upon rejected base claims, but also indicated that such claims would be allowable if rewritten in independent form including all of the limitations of the associated base claim and any intervening claims. Applicant has amended such claims in this manner.

The Examiner rejected Claims 7, 9, 13, 15 and 21 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Examiner has objected to the use of the phrase "textels" as it is not clear to the Examiner. Such rejection is deemed moot in view of the clarifications made hereinabove to the claims.

The Examiner has further rejected Claims 11 and 22-22 under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Such rejection is deemed moot in view of the clarifications made hereinabove to the claims.

The Examiner has further rejected Claims 1-6, 11-12, and 17-19 under 35 U.S.C. 102(e) as being anticipated by Goris et al. (U.S. 6,243,081), hereinafter "Goris." Applicant respectfully disagrees with this rejection. Specifically, applicant has amended each of the independent claims rejected under 35 U.S.C. 102(e) to include the subject matter of Claims 2-3 et al.

The Examiner relies on the following excerpts from Goris to make a prior art showing of applicant's claimed "wherein, prior to sending the request, the texture data is compressed utilizing each of the plurality of compression algorithms, the most favorable compressed texture data is selected utilizing a comparison operation, and the most favorable compressed texture data is stored in the memory; wherein the most favorable compressed texture data provides the most accurate replication of an original version of the texture data" [see former subject matter of Claims 2-3 et al.,

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now incorporated into each of the independent claims rejected under 35 U.S.C. 102(e)].

"In step 1118, a requested data length value is calculated by multiplying $x \cdot \text{count}$. In step 1120, this value is compared with the expected compressed block length value that was set in step 1112. If the requested data length is at least as large as the expected compressed block length, then the read request issuance operation may be stopped, as indicated in step 1124, and the received data uncompressed. Optionally, in implementations using compression/decompression type header fields 506, the decompression may be performed in step 1122 using whichever algorithm was indicated by the decompression type value set in step 1114." (see col. 10, lines 30-41)

"In yet another aspect, the first compressed texture data segment contains a first compression/decompression type indicator. The first compression/decompression type indicator may be used by a computer graphics system to select a decompression algorithm for use in decompressing the first compressed texture data block. The first compression/decompression type indicator may also be contained within the first header." (see col. 3, lines 52-59)

After carefully reviewing these excerpts and the remaining Goris reference, it is clear that Goris in no way even suggests the compression of texture data utilizing the plurality of compression algorithms, whereby the most favorable compressed texture data is selected and stored. Instead, Goris merely suggests the compression of texture data using one of a plurality of compression algorithms, which is identified for later decompression.

This fact is further evidenced by Goris's lack of mention of any sort of most favorable compressed texture data. Since Goris does not disclose any attempt to select a most favorable compressed texture data, it would simply be unobvious and nonsensical to compress the texture data utilizing the plurality of compression algorithms.

Applicant has further emphasized this distinction by further claiming, in each of the independent claims rejected under 35 U.S.C. 102(e), the following:

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“wherein, prior to sending the request, the texture data is compressed utilizing each of the plurality of compression algorithms, the most favorable compressed texture data is selected utilizing a comparison operation, and the most favorable compressed texture data is stored in the memory” (emphasis added).

To this end, only applicant teaches and claims the specific compression of texture data using each of a plurality of compression algorithms, so that a comparison may be used to select the most favorable compressed texture data, as claimed.

The Examiner is reminded that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. Of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, the identical invention must be shown in as complete detail as contained in the claim. *Richardson v. Suzuki Motor Co.* 868 F.2d 1226, 1236, 9USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim.

This criterion has simply not been met by the Goris reference, especially in view of the amendments made hereinabove. A specific prior art showing of such claim limitations or a notice of allowance is respectfully requested.

Further, it appears that there are numerous deficiencies in the Examiner's rejection of the remaining claims. For example, the Examiner has not rendered a substantive prior art rejection of Claims 7, 9, 13, 15, and 20-22.

Still yet, applicant brings to the Examiner's attention the following additional dependent claims that have been added for full consideration:

“wherein the most favorable compressed texture data is selected by comparing errors associated with each of the compression algorithms” (See Claim 23 et al.); and

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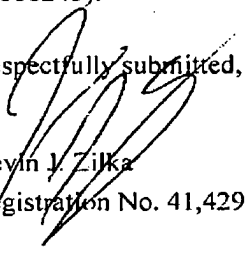
"wherein the errors are calculated after decompression of the texture data that occurs after the compression thereof" (See Claim 24 et al.).

Again, a specific prior art showing of such claim limitations or a notice of allowance is respectfully requested.

All of the pending independent claims are thus deemed allowable along with any claims depending therefrom.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. For payment of any fees due in connection with the filing of this paper, the Commissioner is authorized to charge such fees to Deposit Account No. 50-1351 (Order No. NVIDP044/P000245).

Respectfully submitted,


Kevin J. Zilka
Registration No. 41,429

P.O. Box 721120
San Jose, CA 95172-1120
Telephone: (408) 505-5100